

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 3:19-CR-19-MHL
)	
TROY GEORGE SKINNER,)	
)	
Defendant.)	
)	

**MEMORANDUM IN SUPPORT OF GOVERNMENT’S MOTION
PURSUANT TO 18 U.S.C. § 3509(D) TO SEAL ITS
RESPONSES TO DEFENDANT’S PRETRIAL MOTIONS**

COMES NOW The United States of America, by and through its attorneys,
G. Zachary Terwilliger, United States Attorney for the Eastern District of Virginia, and
Brian R. Hood, and Katherine Lee Martin, Assistant United States Attorneys, and for the reasons
stated below requests that the government’s responses to the defendants pretrial motions (ECF
Nos. 69-73) be sealed.

The defendant’s pretrial motions and the government’s responses contain extensive
“information concerning a child” that is governed by 18 U.S.C. § 3509(d)(1)(A)(i). Pursuant to
that statute, “any other information concerning a child” in written documents must be sealed. *Id.*
The same statute also requires that the party seeking sealing under 18 U.S.C. § 3509(d) provide
the Court with a redacted version of the sealed document to ensure the public’s access to judicial
records. 18 U.S.C. § 3509(d)(2)(B).

WHEREFORE, the United States respectfully requests that the Court grant its motion to
seal its responses to the defendant’s pretrial motions, and that redacted copies of the governments
be made a part of the public record.

Respectfully submitted,

G. ZACHARY TERWILLIGER
UNITED STATES ATTORNEY

By: /s/ Brian R. Hood

Brian R. Hood

Katherine Lee Martin

Assistant United States Attorneys

United States Attorney's Office

919 East Main Street, Suite 1900

Richmond, VA 23219

Telephone: (804) 819-5400

Email: brian.hood@usdoj.gov

Email: katherine.martin@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on **January 24, 2020**, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Robert J. Wagner
Assistant Federal Public Defender
Office of the Federal Public Defender
701 E. Broad St., Ste. 3600
Richmond, VA 23219
(804) 565-0808
Robert_wagner@fd.org

Laura Koenig
Assistant Federal Public Defender
Office of the Federal Public Defender
701 E. Broad St., Ste. 3600
Richmond, VA 23219-1884
Ph. (804) 565-0881
laura_koenig@fd.org

Respectfully submitted,

G. ZACHARY TERWILLIGER
UNITED STATES ATTORNEY

By: /s/ Brian R. Hood
Assistant United States Attorney
United States Attorney's Office
919 East Main Street, Suite 1900
Richmond, VA 23219
Telephone: (804) 819-5400
Email: brian.hood@usdoj.gov